

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARU DESAI,)
Plaintiff,)
)
v.) Civil Action No. 4:19-cv-10520-TSH
)
UNIVERSITY OF MASSACHUSETTS,)
MEMORIAL MEDICAL CENTER, INC.)
UNIVERSITY OF MASSACHUSETTS)
MEMORIAL MEDICAL GROUP,)
UNIVERSITY OF MASSACHUSETTS)
MEDICAL SCHOOL, UMASS)
MEMORIAL HOSPITAL, MAX ROSEN,)
M.D., DARREN BRENNAN, M.D.,)
STEPHEN TOSI, M.D., KARIN DILL,)
M.D.,)
Defendants.)
)

AFFIDAVIT OF PATRICIA WASHIENKO IN SUPPORT OF PLAINTIFF CHARU DESAI,
M.D.'s OPPOSITION TO THE MOTION FOR SUMMARY JUDGMENT OF ALL
DEFENDANTS

I, Patricia Washienko, hereby depose and state as follows:

1. I am an attorney with the law firm Freiberger & Washienko, LLC, and have been retained as counsel for Plaintiff Charu Desai, M.D., in the above-captioned action.
2. I have personal knowledge of the facts contained within this affidavit.
3. I attest to the following Exhibits, which are attached hereto, as containing true and accurate copies of the documents referenced therein. The index begins on the following page.
4. With regard to Exhibit MMMM: for the Court's convenience, Plaintiff prepared a summary chart that lists, for each of the radiologists in the Department, their age, their hire date and age at hire, age at separation, and whether the radiologist was per diem. The information all is derived from Defendants' documents, which follow the Chart. The summary

chart refers to each of the pages from which the data was extracted, by Bates number.

5. With regard to Exhibit QQQQ: for the Court's convenience, Plaintiff annotated a document produced by Defendants identifying the radiologists who separated from the Department from January 1, 2015 (UMM 3690-1) to include each radiologist's age and date of birth. This information is also derived from Defendants' documents that follow the Chart at Exhibit MMMM.

Signed under pains and penalties of perjury,

/s/ Patricia Washienko

Patricia A. Washienko